



Tehipite Chapter, Sierra Club

To explore, enjoy and preserve the nations forest, waters, wildlife and wilderness.

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State of California OHMVR Division
1725 23rd Street, Suite 200
Sacramento, CA 95816

RE: Tehipite Chapter, Sierra Club Comments to State OHV Grant for Sierra NF 2015/2016 Proposal

The Tehipite Chapter of the Sierra Club has questions and concerns regarding the Sierra National Forest's 2015/2016 State OHV Grant #G15-02-17-P02 for proposed planning for adding miles, roads, trails, and areas. We submit the following comments to the State of California OHMVR Division for consideration of this proposed grant.

Planning Grant Objectives

Comment 1 - The 2015/2016 Sierra National Forest (SNF) State OHV Grant proposal is largely a duplicate of an unsuccessful 2009/2010 (# G09-02-17-P02) SNF grant which likewise relied on a contractor and assigned additional responsibilities to agency resource specialists. Since the forest has no additional capacity of resource specialists than they had in 2009/2010, what changes guarantees this duplicate grant will be successful this time?

Unsuccessful 2009/2010 Grant

The Forest's unsuccessful 2009/2010 planning grant underestimated the cost for the contractor with the result that no contractor was used. The SNF tried unsuccessfully to complete the grant with funded Forest's Resources Staff and field crews.

2015/2016 Grant Additions

The 2015/2016 planning grant would fund SNF resource specialists to:

1. review the work of the Enterprise Team, and,
2. *provide any data requested* by the Enterprise Team.

Objective

The SNF's #G15-02-17-P02 planning grant objective is largely a duplicate of the Forest's unsuccessful 2009/2010 grant # G09-02-17-P02 that was "to complete a draft environmental analysis to add roads, trails, and areas" to the SNF's designated motorized trail system.

Successful objectives completed 2009/2010 grant:

- 100 percent completion of the proposed action;
- 25 percent developing alternatives;
- 95 percent soils field surveys and soils oils review of the proposed action completed.

Objectives for the 2015/2016 grant:

1. **Fund a contract** for an Enterprise Team to:
2. refine the proposed action based upon new information, regulations, environmental concerns, and potential significant issues raised by the public;
3. continue development of alternatives to address identified significant issues;
4. develop environmental consequences that would result if a developed alternative were to be implemented;
5. write specialist resource reports and any necessary supportive documents (BE/BAs, Management Indicator Species report, well suited/well sited analysis, affected environment, and others); and,
6. continue field surveys and field work assessments, assess resource concerns, and complete the draft environmental analysis document.

Comment 2 – Unauthorized routes, miles, and areas quantities in the 2009/2010 and the 2015/2016 are exact duplicates. Neither grant contains information, descriptions, conditions and/or locations of these unauthorized routes, miles, and areas that were not analyzed in the 2010 Travel Management Environmental Impact Statement (EIS).

Objectives to complete in the 2009/2010 grant are exact duplicates of those listed in the 2015/2016 grant: “This new planning grant will complete the draft environmental analysis on 180 unauthorized routes for 89 miles and 307 areas for 133 acres.”

The appearance of exact numbers in two duplicate grant proposals suggest specific unauthorized routes, miles, areas and acres are, and have been known, to the SNF *well before the completion* of the 2010 EIS and the 2009/2010 grant. If the **final decision** of the 2010 Travel Management EIS *decided* the “*maximum number of miles of roads and trails and maximum acres*” that met authorization standards for the transportation system, it appears for some reason these unauthorized routes, miles, areas and acres **did not meet** standards to be included in to the transportation system. If these unauthorized routes, miles, areas and acres didn’t qualify to be included in the 2010 EIS, the likelihood they could pass scrutiny eight years later is questionable at best.

Comment 3 – The 2015/2016 grant plans to use data in the 2010 Travel Management Environmental Impact Statement (EIS), an EIS that used 2005 data, that would be 12 years old in the grant award year of 2017. **All data** will have to be reviewed and **new data gathered** for this project planning grant EIS.

The 2015/2016 Grant states:

“This will fulfill the commitment from the SNF to the public to review unauthorized routes that were identified during the Travel Management Environmental Impact Statement (EIS) in 2010, but not analyzed by the SNF during the travel management process.” Moreover, “It is expected this planning project *will tier to the EIS* [Travel Management EIS in 2010] **to eliminate duplication of analysis and fieldwork.**” Planning to use 2005 data makes this an incorrect statement of the actual volume of required work to make this a successful grant.

Using the 2005 database, each track *was reviewed* by resource area specialists and Inter Disciplinary Team members to decide if the track would move forward for further analysis. Those tracks that could be analyzed in more detail, moved through the process to create the alternatives. Hence, each *track was addressed and vetted* in the process to select the best tracks that would move forward through the EIS process and moved forward to become part of the SNF’s motorized transportation system.

Comment 4 – The 2009/2010 and 2015/2016 grants state the EIS of proposed routes, trails, and areas *will/are to be added to the SNF's designated motorized trail system which is in direct conflict* with the SNF EIS, which states:

1. the “decision was based on the Travel Management EIS” that includes “*maximum number of miles of roads and trails and maximum acres*”;
2. that the “net loss of approximately 605,000 acres available for wheeled motor vehicle activities” is “*due to the prohibition of cross-country travel*”; and,
3. that “Motorized recreation opportunity will *focus on a designated motorized trail system.*”

The SNF Travel Management EIS states that the EIS already includes the “*maximum number of miles of roads and trails and maximum acres*”; that the “large” decrease in acreage available for OHV travel is “*due to the prohibition of cross-country travel*”; and, that the SNF “Motorized recreation opportunity will *focus on a designated motorized trail system.*” Both of these grant project proposals appear to be in direct conflict with the SNF’s 2010 Travel Management EIS.

In so far as the planning grant’s intent is “to almost double the total mileage of motorized trails and primitive roads open for a motorized recreation experience...with the 180 unauthorized routes for 89 and 307 acres for 133 acres,” there is a conflict with the Travel Management EIS.

Comment 5 – This planning grant is one of three submitted by an OHV stakeholder group. All three proposals were reviewed and rejected by the SNF Forest Leadership Team because the Forest Team deemed the Forest didn’t have the capacity for any new OHV project planning grants.

In the February 17, 2016, public meeting, the OHV Forest staff officer announced SNF’s lack of capacity to achieve the objectives stated in these three planning grants.

When OHV stakeholders asked why their applications were rejected, the OHV officer restated the reasons for rejecting the grant applications.

Finally, when another OHV stakeholder asked again why their applications were rejected, the SNF Forest Supervisor suddenly and unilaterally reversed the decision and agreed to accept the planning grant applications.

What changed during the public meeting that provided the SNF capacity to complete the project planning grants?

The answer of course is that nothing changed. The forest has not added new capacity that would enable completion of plans it had not been previously able to complete. Indeed, these three project planning grants were received by the Forest after their December 4, 2015, media outreach requesting written feedback from stakeholders about this 2017 grant cycle. The public was directed to submit any written comments to the SNF by January 20, 2016. The SNF internal Forest Leadership Team discussed and determined the Forest continues to not have the capacity to complete additional planning projects, so the three grants were not added to the grant proposal, as the SNF OHV officer explained at the February 17, 2016 public meeting.

The simple fact of the matter is that the SNF Forest Supervisor bowed to pressure from a powerful lobby group and unilaterally reversed the decision of the Forest Leadership Team.

Such a rash decision does not inspire confidence that the forest will now be capable of completing plans it previously was unable to complete.

Comment 6 – Based on the Travel Management EIS, Forest staff was directed to complete a report identifying the Forest's *minimum road system* that will display findings as opportunities and recommendations to inform future SNF management and administration.

However, State OHV Grant #G15-02-17-P02 states the “intent to almost double the total mileage of motorized trails and primitive roads open for a motorized recreation experience.”

Because the SNF has yet to complete their Travel Analysis Report (TAR) explaining their findings for their *minimum road system*, it seems premature to accept this OHV project planning grant into this State OHV grant cycle.

All Forests were to complete Travel Analysis Subpart A to identify their *minimum road system*, write a Travel Analysis report, which is to display findings as opportunities and recommendations to inform future management and administration of the National Forest Transportation System. The SNF has yet to complete their TAR report, making it problematic to adhere to unknown findings and recommendations intended to inform management and administration of the SNF's transportation system that these unauthorized miles, roads, trails and areas represent.

Conclusions – Sierra National Forest was unable to complete plans stated in the 2009/2010 grant and has not added necessary new capacity to complete areas previously left incomplete.

Trails deemed “unauthorized” in the Travel Management EIS are clearly new trails, and the grant application is in direct contradiction with the EIS.

Finally, the forest supervisor suddenly reversed the forest's decision to reject this grant application as presented by his team leader at a public meeting due to pressure from a single stakeholder.

Tehipite Chapter of the Sierra Club therefore strongly urges that this grant application be rejected.

Respectfully,

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